

1 RICHARD A. WRIGHT, ESQUIRE
 Nevada Bar No. 886
 2 RUSSELL E. MARSH, ESQUIRE
 Nevada Bar No. 11198
 3 WRIGHT MARSH & LEVY
 300 S. Fourth Street
 4 Suite 701
 Las Vegas, NV 89101
 5 Office: (702) 382-4004
 Fax: (702) 382-4800
 6 rick@wmllawlv.com
 russ@wmllawlv.com

7 Attorneys for Defendant LANCE K. BRADFORD
 8

9
 10 UNITED STATES DISTRICT COURT
 11 FOR THE DISTRICT OF NEVADA

12 UNITED STATES OF AMERICA,)
 13 Plaintiff,)
 14 vs.)
 15 LANCE K. BRADFORD,)
 16 Defendant.)
 17

Case No. 2:19-CR-00222-GMN-BNW

**STIPULATION AND ORDER TO
 EXTEND HEARING DATE AND
 BRIEFING DEADLINE**

(First Request)

18 IT IS HEREBY STIPULATED and agreed, by and between, LANCE K. BRADFORD,
 19 Defendant, by and through his counsel, RICHARD A. WRIGHT, ESQUIRE, and RUSSELL E.
 20 MARSH, ESQUIRE, WRIGHT MARSH & LEVY, and JASON M. FRIERSON, United States
 21 Attorney, by STEVEN W. MYHRE, Assistant United States Attorney, and J. PATRICK BURNS,
 22 Trial Attorney, United States Department of Justice, that the *Franks* hearing now scheduled for July
 23 8, 2022, be continued for at least 10 days, preferably to July 18 or 19, 2022. In addition, the parties
 24 agree that Mr. Bradford will have until July 6, 2022, to file his brief on the standing issue.

25 This stipulation is entered into for the following reasons:

26 1. This Court ordered that a *Franks* hearing be held in this matter and that matter has
 27 so far been heard on June 14-15, 2022. (ECF Nos. 94, 99, 108, 109.) A third hearing day of the
 28 hearing has been set for July 8, 2022. (ECF No. 108.)

2. On the morning of July 1, 2022, one of Mr. Bradford's counsel tested positive for COVID-19. Out of caution, the parties have agreed to continue the third hearing day for at least 10 days.

3. The parties are available for a one-day hearing on July 18, 19 or 29, 2022. Mr. Bradford is not available the week of August 1, 2022.

4. In addition, Mr. Bradford's brief on the standing issue is now due on July 1, 2022. (ECF No. 108.) The parties agree that Mr. Bradford may file his brief on the issue of standing on or before July 6, 2022.

5. This is the first request to extend the hearing date and response deadline.

WHEREFORE, the United States of America, and the Defendant, Lance Bradford, jointly request that Day 3 of the *Franks* hearing be continued, and that Mr. Bradford's time to brief the standing issue be extended.

Dated this 1st day of July, 2022.

WRIGHT MARSH & LEVY

JASON M. FRIERSON
United States Attorney

By /s/ Russell E. Marsh
RICHARD A. WRIGHT, ESQUIRE
RUSSELL E. MARSH, ESQUIRE
300 S. Fourth Street
Suite 701
Las Vegas, NV 89101
Counsel for Defendant Bradford

By /s/ Steven W. Myhre
STEVEN W. MYHRE
Assistant U.S. Attorney
501 Las Vegas Boulevard South
Suite 1100
Las Vegas, NV 89101

By /s/ J. Patrick Burns
J. Patrick Burns
Trial Attorney
Tax Division
U.S. Department of Justice

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

UNITED STATES OF AMERICA,
Plaintiff,
vs.
LANCE K. BRADFORD,
Defendant.

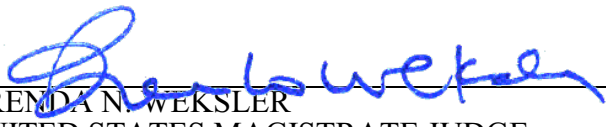
Case No. 2:19-CR-00222-GMN-BNW

ORDER

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court hereby continues Day 3 of the *Franks* hearing to July 29th, 2022, at 10:00 a.m. in Courtroom 3A.

IT IS FURTHER ORDERED that Mr Bradford shall have until July 6, 2022, to file his brief on the standing issue.

Dated: 7/5/2022


BRENDA N. WEKSLER
UNITED STATES MAGISTRATE JUDGE